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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

**INDEX NEWSPAPERS LLC**, a Washington limited-liability company, dba **PORTLAND MERCURY**; **DOUG BROWN**; **BRIAN CONLEY**; **SAM GEHRKE**; **MATHIEU LEWIS-ROLLAND**; **KAT MAHONEY**; **SERGIO OLMOS**; **JOHN RUDOFF**; **ALEX MILAN TRACY**; **TUCK WOODSTOCK**; **JUSTIN YAU**; and those similarly situated,

Plaintiffs,

v.

**CITY OF PORTLAND**, a municipal corporation; **JOHN DOES 1-60**, officers of Portland Police Bureau and other agencies working in concert; **U.S. DEPARTMENT OF HOMELAND SECURITY**; and **U.S. MARSHALS SERVICE**,

Defendants.

Case No. 3:20-cv-1035-SI

**JOINT STIPULATION TO EXTEND PLAINTIFFS' DEADLINE TO RESPOND TO FEDERAL DEFENDANTS' MOTION TO DISMISS**

Plaintiffs Index Newspapers LLC (“Portland Mercury”), Doug Brown, Brian Conley, Sam Gehrke, Mathieu Lewis-Rolland, Kat Mahoney, Sergio Olmos, John Rudoff, Alex Milan Tracy, Tuck Woodstock, and Justin Yau (“Plaintiffs”) and Defendants U.S. Department of Homeland Security and U.S. Marshalls Service, (“Federal Defendants”), by and through their respective attorneys of record, hereby jointly stipulate as follows:

WHEREAS, on June 28, 2020, Plaintiffs filed their Complaint;

WHEREAS, on July 10, 2020, Plaintiffs filed their First Amended Complaint;

WHEREAS, on July 17, 2020, Plaintiffs filed their Second Amended Complaint to include Federal Defendants;

WHEREAS, on September 21, 2020, the Federal Defendants filed their Motion to Dismiss the Second Amended Complaint;

WHEREAS, Federal Rule of Civil Procedure 6 provides that “[t]he court may, for good cause, extend the time . . . , if a request is made, before the original time or its extension expires,” Fed. R. Civ. P. 6(b)(1); and

WHEREAS, on October 1, 2020, the parties met and conferred and have agreed that Plaintiffs may extend the time to respond to the Motion to Dismiss by 14 days;

IT IS NOW THEREFORE STIPULATED by and between the attorneys for the undersigned parties to this action, that:

1. Plaintiffs’ response to the Federal Defendants’ Motion to Dismiss the Second Amended Complaint shall be filed and served no later than October 19, 2020.

2. Federal Defendants’ reply to Plaintiffs’ response shall be filed and served no later than November 2, 2020.

Dated: October 2, 2020

Respectfully submitted,

**BRAUNHAGEY & BORDEN LLP**

By: /s/ Athul K. Acharya

Athul K. Acharya, OSB No. 152436

*Attorneys for Plaintiffs*

Dated: October 2, 2020

Respectfully submitted,

**U.S. DEPARTMENT OF JUSTICE**

By: /s/ Joshua E. Gardner

Joshua E. Gardner

*Attorneys for Defendants U.S. Department  
of Homeland Security and U.S. Marshals  
Service*